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Richland Operations Office  
P.O. Box 550  
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04-RCA-0034

DEC 3 2003

Ms. Kathy Conaway  
Environmental Specialist  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336

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EDMC

Dear Ms. Conaway:

STATE WASTE DISCHARGE PERMIT COMPLIANCE INSPECTION ON THE HANFORD SITE (ST 4508) ON JULY 29, AUGUST 6, AND SEPTEMBER 11, 2003

This letter responds to your letter to J. B. Hebdon, U.S. Department of Energy (DOE), Richland Operations Office (RL), and Roy Schepens, DOE, Office of River Protection, titled "State Waste Discharge Permit Compliance Inspection on the Hanford Site (ST 4508) on July 29, August 6, and September 11, 2003," dated August 29, 2003. During the compliance inspection, the State of Washington Department of Ecology (Ecology) noted five concerns. All five concerns are addressed as follows:

Concern #1: "The current ST 4508 Permit Fact Sheet makes no mention of the Hammer Pond."

Response: RL and Fluor Hanford, Inc. are working with Ecology to consolidate State Waste Discharge Permits ST 4508, ST 4509, and ST 4510. A draft fact sheet for the new waste discharge permit, ST-4511, was submitted to Ecology for review. The draft fact sheet addresses the Hazardous Materials Management and Emergency Response (HAMMER) Pond.

Concern #2: "Permit ST 4508 does not have an allowed discharge quantity for the Hammer Pond."

Response: The allowed discharge quantity for the HAMMER Pond has been addressed in the draft fact sheet. The final permit will be written by Ecology. The discharge quantity for the HAMMER Pond will be included in the permit if necessary.

Concern #3: "The BMP has a requirement for a weekly water level check."

Response: The Best Management Practice (BMP) document's requirement to check water levels was intended to verify pond leakage. However, RL agrees that measuring the amount of leakage from an open pond in this manner would be nearly impossible because of evaporation, water usage for training purpose, and precipitation. A change in water level does not necessarily indicate leakage. This item was discussed with Ecology during the inspection. The requirement

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to check the water level may not be included in the revised BMP that will be revised once the permit is issued.

Concern #4: "The Hammer Pond incoming water line is improperly labeled."

Response: The label on the HAMMER Pond incoming water line was changed to "potable water" on July 30, 2003.

Concern #5: "An empty 55 gallon polyethylene drum displayed old labels."

Response: The empty polyethylene drum was removed from the Pump House (Building #6092I) on July 30, 2003. The drum labels also were removed. The drum was placed with other drums used in training classes at HAMMER.

If you have any questions, please contact William Edwards, Office of Associate Manager for Science and Technology, on (509) 372-1291; or Mary Jarvis, of my staff, on (509) 376-2256.

Sincerely,



Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

RCA:MFJ

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